

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09100002-2011**  
Application Received: **October 20, 2010**  
Plant Identification Number: **03-54-091-00002**  
Permittee: **AGC Flat Glass North America, Inc.**  
Facility Name: **Jerry Run Facility**  
Mailing Address: **1200 AFG Road, Bridgeport, WV 26330**

*Revised NA*

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Physical Location:	Rosemont, Taylor County, West Virginia
UTM Coordinates:	570.30 km Easting • 4348.60 km Northing • Zone 17
Directions:	From Interstate 79 take exit 124 (WV Route 279) to US Route 50. Turn left on Route 50 East to Taylor County. Approximately 1.2 miles into Taylor County turn right onto County Route 50/3 (AFG Road). Follow road approximately 1.4 miles to plant on the left.

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### Facility Description

AGC Flat Glass North America, Inc. Jerry Run Facility (AGC) is a glass manufacturing facility covered by Standard Industrial Classification (SIC) 3211 and North American Industry Classification System (NAICS) 327211. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year. The facility consists of one (1) float glass melting furnace, one (1)lehr, three (3) seamers, one (1) electric tempering furnace, seven (7) storage silos, several baghouses, numerous crushers, screw conveyors, bucket elevators, closed belt conveyors, and hoppers, (4) tanks of various capacities, and storage and cutting glass facilities. Emergency equipment on-site consists of two (2) diesel fired emergency generators and two (2) diesel emergency fire pump engines.

## Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO) <sup>1</sup>	82.35	3.69
Nitrogen Oxides (NO <sub>x</sub> ) <sup>2</sup>	1,767.11	99.50
Particulate Matter (PM <sub>2.5</sub> )	118.22	3.34
Particulate Matter (PM <sub>10</sub> )	126.41	3.34
Total Particulate Matter (TSP) <sup>3</sup>	145.27	16.26
Sulfur Dioxide (SO <sub>2</sub> ) <sup>4</sup>	604.08	38.45
Volatile Organic Compounds (VOC) <sup>5</sup>	46.61	2.74
Lead (Pb)	1.00	9.1 X 10 <sup>-6</sup>
<i>PM<sub>10</sub> is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2009 Actual Emissions
Total HAPs <sup>6</sup>	9.0	0
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

The 2011 PTEs differ from first renewal 2006 PTEs. There are number of reasons: (1) different consultants were used for each renewal, (2) calculations or methodology for the first renewal PTE used were unattainable, and (3) the facility has been idle for approximately two years and facility personnel that are no longer employed were unavailable to answer questions. The current renewal application calculations are based on the best available information that was obtained from AGC.

- <sup>1</sup> The difference in 2011 CO PTE is that the other combustion sources (space heating, emergency generators and fire pump) were not included in the 2006 CO PTE.
- <sup>2</sup> The difference in NO<sub>x</sub> PTE is the inclusion of other combustion sources plus the emission limits increase for the Furnace in previous NSR permit.
- <sup>3</sup> The 2006 TSP PTE information is unavailable. The 2011 TSP PTE includes the Furnace emission limits per NSR permits plus other process operation and fugitive emissions and without ammonia. According to the Implementation of the NSR Program for PM<sub>2.5</sub>, that was a final rule in 73FR28321 on May 16, 2008, ammonia is a precursor for PM<sub>2.5</sub>.
- <sup>4</sup> The difference in SO<sub>2</sub> PTE is unknown as outlined above.
- <sup>5</sup> The discrepancy in VOC PTE is unknown as outlined above.
- <sup>6</sup> The 2006 HAPs PTE information is unavailable. The 2011 PTE increase in HAPs emissions is based on the potential of using glass manufacturing metal HAP. The facility currently does not consume raw materials that contain HAPs nor process related HAPs.

## Title V Program Applicability Basis

This facility has the potential to emit 1,767.11 tons per year of Nitrogen Oxides (NO<sub>x</sub>), 126.41 tons per year of Particulate Matter (PM<sub>10</sub>), and 604.8 tons per year of Sulfur Dioxide (SO<sub>2</sub>). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, AGC Flat Glass North America, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations
	45CSR10	To Prevent and Control Air Pollution from the Emissions of Sulfur Dioxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
State Only:	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
	45CSR7A	Compliance Test Procedures 45CSR7. (Sections of this rule are Federally enforceable since those sections have been SIPed.)
	42CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-0080C	November 21, 2006	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### **Determinations and Justifications**

Since the most recent permit (R30-09100002-2006 (AA01)) was issued, there have been no changes to the AGC Flat Glass North America, Inc. Jerry Run Facility Title V Permit.

The following updates were made in the renewal.

1. The Emission Unit Table 1.0 was revised in accordance with Attachment D of AGC Flat Glass North America, Inc. Jerry Run Facility Title V Renewal Application.
2. Added Section 1.2, Active R13, R14, and R19 Permits and Table.
3. The regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2, was updated.
4. 45CSR34 is now cited with 40 C.F.R. Part 61 and 45CSR15 was repealed. The citation for 3.1.3 has been revised accordingly.
5. Section 3.1.12 table was revised by removing rows 2 and 3 that were for the Seamer Baghouse and the New Seamer Baghouse since the Tempering equipment was removed from the Jerry Run Facility.
6. Title V Boiler Plate was revised to incorporate the greenhouse gas language, 45CSR42, in Sections 3.1.18 and 3.5.10.
7. 40 C.F.R. Part 63 Subpart ZZZZ area source requirements were incorporated as Section 3.1.19.
8. The boilerplate language for Section 3.3.1 was revised with the addition of Section 3.3.1.d and the citation was also revised to expand the authority of the West Virginia state code.
9. Sections 3.5.3 and 3.5.5 were revised accordingly to US EPA Region 3 request that all annual compliance certifications be submitted electronically (e-mail). This is a general change to the boiler plate language.
10. Section 4.1.9 was added to ensure that the facility complies with 40 C.F.R. Part 63 Subpart SSSSSS if it uses manganese or any other glass manufacturing metal HAP as defined in Subpart SSSSSS.
11. The Furnace testing requirements in Section 4.3.1 table were established and revised by NSR permits, R13-0080B and R13-0080C. In Section 4.3.1 table and in the preceding language, the initial test requirements for the Furnace were removed since they have been completed. Because the mass emission rates for NO<sub>x</sub> and VOC were greater than 60% (according to the October 2006 testing), the current testing frequency is Once/3 years for these pollutants. For PM and CO, the current testing frequency is Once/5 years since the mass emission rates were less than 60% (according to the October 2006 testing). Due to the economic conditions, glass manufacturing was halted at the Jerry Run Facility in February of 2009. When the Jerry Run Facility resumes manufacturing glass, the hourly emission limits compliance testing program for the Furnace will

restart. After the facility restarts, compliance tests shall be performed within 180 days of restart in accordance with 45CSR§30-5.3.a (see Section 4.3.1).

12. AGC Flat Glass North America Industries, Inc. has not made any modifications that would trigger a PSD permit for a GHG Clean Act requirement.

#### **40 C.F.R. Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

The AGC Flat Glass North America Industries, Inc. Jerry Run Facility has two (2) 1,540 HP emergency generators (008-01 and 008-02) each and two (2) 215 HP emergency fire pumps (501 and 502), each are subject as an area source of 40 C.F.R. Part 63 Subpart ZZZZ, which is only federally enforceable. The facility is a minor source of HAPs. These engines were constructed prior to June 12, 2006. The facility shall comply with all applicable requirements of 40 C.F.R. Part 63 Subpart ZZZZ by October 19, 2013 per 40 C.F.R. § 63.6595 (see Section 3.1.19.).

#### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

<b>45CSR2</b>	AGC Flat Glass North America Industries, Inc., Furnace is not subject to 45CSR2 because the Furnace is direct fired.
<b>45CSR10</b>	A DAQ determination was made that 45CSR10 does not apply to the generators at the Jerry Run facility since the generators are not manufacturing process source operations. Also, the facility is not subject to 45CSR§10-5 since it does not refine or process gas streams.
<b>45CSR17</b>	AGC Flat Glass North America Industries, Inc. is subject to 45CSR7 which exempts it from 45CSR17, To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter, as stated in 45CSR§7-10.2.
<b>45CSR33</b>	Acid Rain Provisions and Permits do not apply to AGC Flat Glass North America Industries, Inc. because it is not considered a Title IV (Acid Rain) Source.
<b>40 C.F.R. Part 60 Subpart CC</b>	Standards of Performance for Glass Manufacturing Plants do not apply because AGC Flat Glass North America Industries, Inc. glass manufacturing operation precedes the NSPS Subpart CC date of October 24, 1979.
<b>40 C.F.R. Part 60 Subpart OOO</b>	40 C.F.R. Part 60 Subpart OOO does not apply to AGC Flat Glass North America Industries, Inc. since the facility commenced construction, modification, or reconstruction in 1974, prior to the August 31, 1983 date for 40 C.F.R. Part 60 Subpart OOO.
<b>40 C.F.R. Part 61 Subpart N</b>	AGC Flat Glass North America Industries, Inc. is not subject to National Emission Standard for Inorganic Arsenic Emissions From Glass Manufacturing Plants because it does not use arsenic in its process.
<b>40 C.F.R. Part 60 Subpart IIII</b>	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The two (2) 215 hp emergency fire pump engines and two (2) emergency generators were manufactured before July 11, 2005. Thus, these engines are not subject to 40 C.F.R. Part 60 Subpart IIII.
<b>40 C.F.R. Part 60 Subpart JJJJ</b>	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The two (2) 215 hp emergency fire pump engines and two (2) 1MMBtu/hr emergency generators were manufactured before July 12, 2006 and these units combust diesel fuel. Thus, these engines are not subject to 40 C.F.R. Part 60 Subpart JJJJ.

<b>40 C.F.R. Part 63 Subpart SSSSSS</b>	National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources. AGC Flat Glass North America, Inc. Jerry Run Facility is not subject to 40 C.F.R. Part 63 Subpart SSSSSS since the company provided a letter stating that the facility will no longer use manganese or any other a glass manufacturing metal HAP in their glass manufacturing process.
<b>40 C.F.R. Part 64</b>	This is the second permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first renewal. Therefore, a CAM determination is not required.
<b>40 C.F.R. Part 72</b>	Acid Rain Program General Provisions does not apply to AGC Flat Glass North America Industries, Inc. because it is not considered a Title IV (Acid Rain) Source.

### Request for Variances or Alternatives

None

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: February 25, 2011  
Ending Date: March 28, 2011

All written comments should be addressed to the following individual and office:

Wayne Green  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### Point of Contact

Wayne Green  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

(Choose) Not applicable at this time.

**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.